

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



OFFICE OF  
AIR AND RADIATION

January 19, 2011

Dear ENERGY STAR<sup>®</sup> Integral LED Lamp Partner or Interested Party:

On November 15, 2010, the U.S. Environmental Protection Agency (EPA) issued a letter indicating the Agency's intent to remove "Non-Standard Lamps" from the ENERGY STAR Integral LED Lamps specification, due to concerns that consumer misunderstanding of these products could undermine confidence in the ENERGY STAR program. The purpose of this letter is to notify you that upon further consideration, as a potential alternative, EPA has decided to pursue enhancements to the labeling requirements associated with these products to ensure that consumers purchasing qualified non-standard lamps understand their intended use, the applications for which they are designed, and their limitations.

Solid state lighting, like other energy efficient lighting technologies, has great potential to help American consumers and businesses save energy and save money, while helping to protect the environment. As the technology continues to mature, EPA, the Department of Energy and ENERGY STAR partners and stakeholders have discussed at length the necessity of ensuring positive consumer experiences with solid state lighting products to avoid the problems associated with early compact fluorescent lamps. The Agency recognizes that consumers are accustomed to employing standard lamp shapes in their homes and businesses, and have an established understanding of what performance to expect from those shapes. EPA is concerned that LED lamps exhibiting standard shapes but not meeting photometric performance requirements established for those shapes will disappoint consumers whose expectations are set in large part by physical similarities. In the worst case scenario, these disappointed consumers would relate their negative experience with ENERGY STAR, and with LEDs.

In response to the November 15 request for comment, EPA received input from partners and stakeholders agreeing with the potential for non-standard lamps to create confusion for consumers, and agreeing with the potential for this confusion to create negative impressions about solid state lighting products generally, including non-standard lamps. Concerns were also expressed that even if the ENERGY STAR program eliminates the non-standard category, these lamps would continue to be brought to market. The majority of comments received requested that EPA use the ENERGY STAR label to clarify to consumers which of these non-standard lamps are efficient, quality products.

Responses to the November 15 letter included a variety of recommendations, primarily focused on improvements to packaging and labeling requirements. The Agency agrees that providing additional information to the consumer is most likely to minimize dissatisfaction resulting from misunderstanding of these products. The specification as currently written has two primary requirements for labeling of non-standard lamps. On lamp packaging, promotional materials or

cut sheets, in either print or electronic form, qualified non-standard lamps are not permitted to state an equivalency to standard lamp shapes (e.g. A-19 or “A-line”), and also may not state an equivalency to incandescent lamp performance or wattage. In addition to these limitations already stated in the specification, EPA proposes the requirements outlined on the enclosed page, intended to minimize confusion and avoid negative consumer experiences with qualified non-standard lamps. The Agency believes that consistent messaging is necessary to ensure consumer understanding of the appropriate application of these products, and their limitations, and therefore proposes to remove the specification’s current provision for manufacturers to individually develop their own icons.

EPA invites comment on the enclosed proposal. Comments may be submitted to [ssl@energystar.gov](mailto:ssl@energystar.gov) until February 11, 2011. ENERGY STAR qualification of non-standard lamps will be suspended until EPA reaches a final decision concerning potential changes to the labeling requirements for these products.

Please feel free to contact me directly with questions at [baker.alex@epa.gov](mailto:baker.alex@epa.gov), or (202) 343-9272. Thank you for your support of ENERGY STAR.

Sincerely,

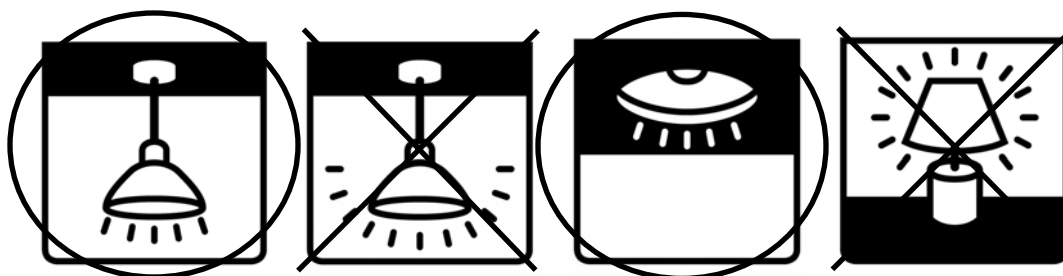
A handwritten signature in black ink, appearing to read 'Alex Baker', with a stylized flourish at the end.

Alex Baker  
Lighting Program Manager, ENERGY STAR  
U.S. Environmental Protection Agency

Enclosure

## Proposed Additions to ENERGY STAR Integral LED Lamp Specification Requirements for Non-Standard Lamps

1. The lamp shape and incandescent wattage equivalency claim restrictions currently indicated in the specification shall also apply to labeling on the lamp itself.
2. ENERGY STAR qualified “non-standard” lamps shall be labeled “NON STANDARD LAMP” on the front-facing panel of the product packaging.
3. Qualified non-standard lamp packaging shall employ the system of iconography detailed in Appendix C of the Integral LED Lamps specification. Employing these specific icons would no longer be optional, as currently written, nor would it suffice to employ these icons on package inserts alone. Partners shall use both the recessed and table fixture icons on the packaging of each qualified non-standard lamp, and shall select a minimum of two additional icons to display. The applications for which the lamp is appropriate shall be circled, and those applications for which the lamp’s luminous intensity distribution would fail to meet the requirements of a given task shall be marked with an “X”. As an example (detailed below), the packaging of a non-standard lamp which does not illuminate the surface below when installed in a table or floor fixture would be required to indicate an “X” through the table fixture icon.



4. Mirroring ENERGY STAR logo use guidelines, the above icons, not inclusive of the circles or X's, shall be printed no smaller in width than 3/8". The logos shall not be located on the bottom of product packaging.
5. The above system shall also be employed on all associated promotional materials and cut sheets, either in print or electronic form.